

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

CHRISTOPHER KOHLS,

**Plaintiff,**

V.

ROBERT A. BONTA, et al.,

Defendants.

Case No. 2:24-cv-02527-JAM-CKD

**NOTICE OF UNOPPOSED REQUEST TO  
REDACT OR FILE UNDER SEAL THE  
IDENTIFYING INFORMATION OF THE  
X CORP. AND RUMBLE DECLARANTS**

**Judge:** John A. Mendez

THE BABYLON BEE, LLC, et al.,

**Plaintiffs,**

V.

ROBERT A. BONTA, et al.,

### Defendants.

RUMBLE, INC., et al.,

**Plaintiffs,**

V.

ROBERT A. BONTA, et al.,

### Defendants.

X CORP

**Plaintiff**

V

ROBERT A. BONTA et al.

## Defendants

**NOTICE OF UNOPPOSED REQUEST TO  
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IDENTIFYING INFORMATION OF THE X  
CORP. AND RUMBLE DECLARANTS**

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 5.2 and Civil  
3 Local Rules 140 and 141, on March 7, 2025—concurrent with filing this notice—Plaintiffs X Corp.  
4 and Rumble Inc. and Rumble Canada Inc. (collectively “Rumble”) have made a narrow Unopposed  
5 Request to Redact or File Under Seal the Identifying Information of the (i) X Corp. Strategy and  
6 Operations (“S&O”) Team Declarant in the S&O Team Declaration in Support of Plaintiffs’  
7 Motion for Summary Judgment Against AB 2655 (“X Corp. S&O Team Declaration”) and (ii)  
8 Rumble content moderator in the Rumble Declaration in Support of Plaintiffs’ Motion for Summary  
9 Judgment Against AB 2655 (“Rumble Declaration”), and have submitted the accompanying  
10 Declarations of Samantha Birkenfeld-Malpass and Stacey Beall in support of such request. The  
11 identifying information sought to be redacted is the X Corp. S&O Team Declarant’s and Rumble  
12 Declarant’s names, employment titles, and locations where the Declarations were executed.

13 If the identities of the X Corp. S&O Team Declarant and Rumble Declarant are made public  
14 in connection with this lawsuit, there is a serious risk that the Declarants will face threats,  
15 harassment, and an invasion of privacy. The non-redacted X Corp. S&O Team Declaration, non-  
16 redacted Rumble Declaration, proposed redacted X Corp. S&O Team Declaration, proposed  
17 redacted Rumble Declaration, Request to Redact or File Under Seal, Declaration of Samantha  
18 Birkenfeld-Malpass in Support of the Request to Redact or File Under Seal, Declaration of Stacey  
19 Beall in Support of the Request to Redact or File Under Seal, and Proposed Order Granting X  
20 Corp.’s and Rumble’s Request to Redact or File Under Seal, will be emailed to the proposed orders  
21 email box of the Honorable Judge Mendez, and will be served on all other parties, in accordance  
22 with Civil Local Rule 141(b).

23 Plaintiffs X Corp. and Rumble conferred with Defendants about this Request to Redact or  
24 Seal, and Defendants do not oppose it.

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1 DATED: March 7, 2025

2 By: /s/ Joel Kurtzberg  
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12 *Attorneys for Plaintiff X Corp.*

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26 *Attorneys for Plaintiffs Rumble Inc. and Rumble Canada Inc.*

27  
28 NOTICE OF UNOPPOSED REQUEST TO  
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IDENTIFYING INFORMATION OF THE X  
CORP. AND RUMBLE DECLARANTS

1                   **PROOF OF SERVICE**

2                   I hereby certify that I caused to be filed a true and accurate copy of the foregoing document  
3 with the Clerk of Court using the CM/ECF system, which automatically sends an electronic  
4 notification to all attorneys of record in this case.

5

6 Dated: March 7, 2025

7                   By: /s/ Joel Kurtzberg  
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